

EXHIBIT 3

UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

LOCAL UNION NO. 98
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS, et al.

Plaintiffs

v

RGB SERVICES, LLC, et al.

Defendants

Civil Action No. 11-4579

**AFFIDAVIT OF ED COPPINGER IN SUPPORT OF PLAINTIFFS'
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT PURSUANT TO RULE 56 OF THE FEDERAL
RULES CIVIL PROCEDURE**

I, Ed Coppinger of full age, being first duly sworn according to law upon his oath does
say and depose:

1. I am an employee of the Local Union No. 98, International Brotherhood of
Electrical Workers Union.

2. I serve as a business agent on behalf of Local Union No. 98, International
Brotherhood of Electrical Workers Union.

3. The duties and responsibilities associated with my employment with Local Union
No. 98, International Brotherhood of Electrical Workers Union require that I monitor the activity
of signatory contractors bound to the provision of the Sound and Communication Commercial
Voice-Data-Video Agreement, Supplements, Addendums, and Appendices.

4. I have knowledge and information formed after reasonable investigation that at

times material and relevant to claims set forth in the Complaint filed in the instant matter that defendant RGB Services, LLC was at all relevant times a signatory contractor bound to the provision of the Sound and Communication Commercial Voice-Data-Video Agreement, Supplements, Addendums, and Appendices.

5. I have knowledge and information formed after reasonable investigation that at times material and relevant to claims set forth in the Complaint filed in the instant matter defendant RGB Services, LLC defendant RGB Services, LLC has never served written notice of upon Local Union No. 98, International Brotherhood of Electrical Workers Union to terminate its obligation to be bound by the provisions of the controlling Sound and Communication Commercial Voice-Data-Video Agreement, Supplements, Addendums, and Appendices.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willingly false, I am subject to punishment.

Dated:

8/1/12

By:



Ed Coppinger

Business Agent

Local Union No. 98, International Brotherhood of Electrical Workers Union.